

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIA STAPLETON, et al on behalf of
themselves, individually, and on behalf of all
others similarly situated, and on behalf of the
advocate plan,

Plaintiffs,

v.

ADVOCATE HEALTH CARE NETWORK
AND SUBSIDIARIES, ET AL.,

Defendants.

Civil Action No. 1:14-cv-01873

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE MEMORANDUM IN
SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT
AGREEMENT EXCEEDING THE PAGE LIMITATION**

Plaintiffs Maria Stapleton, Judith Lukas, Sharon Roberts, and Antwain¹ Fox

("Plaintiffs"), by and through their attorneys, respectfully move for leave to file a Memorandum in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement Agreement ("Memorandum") that exceeds the 15-page limit, in accordance with Local Rule 7.1. Plaintiffs submit the following in support:

1. Plaintiffs filed this action under the Employee Retirement Income Security Act as a class action suit. As a result, any settlement this Court approves will impact as many as 33,000 participants in and beneficiaries of the Advocate Health Care Network Pension Plan. For this reason, it is imperative that this Court be fully informed of all relevant facts and legal arguments.

2. The putative class in this action has not yet been certified. Thus, in addition to demonstrating the appropriateness of the settlement agreement, the suitability of class counsel,

¹ Antwain Fox was inadvertently named in the Complaint as "Antoine Fox."

and the sufficiency of the proposed notice, Plaintiffs must also demonstrate in their Memorandum that the proposed class satisfies the requirements for certification pursuant to Rule 23 of the Federal Rules of Civil Procedure.

3. Plaintiffs cannot provide the Court with the facts and law necessary to make these showings in the page limitation set forth in Local Rule 7.1. Instead, Plaintiffs request that the Court grant them leave to file a Memorandum not to exceed 23 pages in length.

4. Counsel for Defendants have been advised of this request and do not oppose it.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter an Order granting Plaintiffs' Motion to Exceed the Page Limitation.

Dated: February 16, 2018

Respectfully submitted,

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2018, I electronically filed the above with the Clerk of the Court using the CM/ECF system, which in turn sent notice to all counsel of record.

Dated: February 16, 2018

/s/ Christopher Graver
Christopher Graver